

Lake County Fire Chief's Association
3221 N. Greenbay Road
Waukegan, IL 60085

September 25, 2003

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT Docket No. 99-87/RM-9332

Dear Ms. Dortch:

Please accept this letter in support of the petition for reconsideration filed by the Association of Public-Safety Communications Officials (APCO), the International Municipal Signal Association (IMSA), the International Association of Fire Chiefs (IAFC), and other public safety organizations in the above-referenced proceeding regarding mandatory migration to narrowband operations on public safety land mobile radio systems in the VHF High Band (150-170 MHz) and UHF (421-512 MHz) frequencies.

The majority of fire service radio systems in our area utilize VHF High Band frequencies for both dispatch and operations. While we support migration to narrowband technologies, the stark reality is that it will take many years to phase out the use of wideband radios that are in daily use by large city as well as small volunteer departments in Lake County.

As the result of new Homeland Security initiatives, the Mutual Aid Box Alarm System (MABAS), that represents over 800 fire departments in Illinois, Southern Wisconsin and the St. Louis, Missouri area, has adopted a communications interoperability plan that includes four (4) existing wideband frequencies and four (4) new narrowband channels. All fire departments in Illinois, as well as member departments in adjacent states, have been encouraged to obtain FCC authorizations for the eight frequencies.

The FCC's rulemaking concerning "near-term" dates for limiting expansion on existing wideband frequencies will derail our interoperability plan and potentially place the safety of both first responders and the general public in jeopardy. The current deadline of January 13, 2004 for the FCC to accept applications to modify existing 25 kHz systems will prevent public safety licensees from adding critical capacity and coverage for existing systems and expansion for interoperability. Modifications to existing as well as approval of new authorizations that enhance public safety interoperability should be permitted until the final migration deadline.

The Commission's actions prohibiting the certification, manufacture and importation of 25 kHz capable land mobile radio equipment after 2008 will also have a devastating effect on

most area fire departments. The FCC's actions will ultimately require these departments to spend thousands of precious dollars to replace radio equipment to permit narrowband operation well before the 2018 deadline. The deadline for manufacture and sale of 25 kHz capable radios should coincide with the deadline for mandatory conversion to narrowband emissions.

Thank you for your attention, and the attention of the full Commission, regarding the important public safety issues addressed. We support the Petition for Reconsideration filed in response to the Commission's ruling in WT Docket Number 99-87 and strongly encourage the Commission to reverse its ruling and involve public safety professionals in further rule making that adversely affects the public safety and health of the citizens of the United States of America.

Sincerely,

T.E. Sashko
Fire Chief

cc: Senator Richard J. Durbin
Senator Peter G. Fitzgerald
Congressman Philip M. Crane – 8th Congressional District
Congressman Mark S. Kirk – 10th Congressional District

September 25, 2003

The Honorable Congressman Philip M. Crane
233 Cannon House Office Building
Washington, D.C. 20515

Dear Congressman Crane,

The Federal Communications Commission (Commission) published rules on July 13, 2003 that, if implemented, will have a devastating affect on the ability for fire departments and other public safety agencies throughout the United States to modify their existing radio systems. The Commission's actions will negatively affect the fire service's plans to provide interoperability throughout the State of Illinois and surrounding areas.

Action by the Commission will effectively prevent the expansion of existing public safety radio systems and other FCC authorization changes after January 13, 2004. They have also published rules that will prevent the certification, manufacture and importation of radios that will operate on existing public safety radio networks after 2008.

Several years ago the Commission implemented spectrum refarming initiatives that created additional usable radio spectrum for public safety and other users of wireless services. This "refarming" will require virtually all public safety radio users of frequencies below 800 MHz to change the mode of operation of their existing public safety radio systems. A timetable to fully implement the "refarming" was established by the Commission. Public safety users would be required to comply by 2018. This lengthy implementation would give all public safety users more than adequate time to plan, budget and purchase radio equipment that will function on the new "refarmed" narrowband frequencies.

Action by the Commission, published in July, effectively moves up implementation for public safety users by an entire decade. The cost for tens of thousands of fire departments to replace their existing radio equipment with new "narrowband" capable equipment will be staggering.

The Association of Public Safety Communications Officials (APCO), International Municipal Signal Association (IMSA), International Fire Chiefs Association (IAFC), International Association of Chiefs of Police (IACP) and the National Sheriff's Association (NSA) are just a few of the premier public safety organizations that oppose the Commission's actions. The aforementioned groups filed a Petition for Reconsideration before the Federal Communications Commission on August 18, 2003. I have filed a letter support for the Petition for Reconsideration and a copy is included.

Please take a personal interest in this very important public safety issue. Failure of the Commission to repeal its rulemaking will derail many Homeland Security initiatives that are being enacted in Illinois that regard public safety communications interoperability as well as the ability of our nation's first responders to communicate at routine emergencies.

I can be reached at 847-537-0995 or via e-mail at tsashko@vbg.org if you or a member of your staff require additional information. Thank you again for your assistance.

Sincerely,

T.E. Sashko
Fire Chief